

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:
Muhammad D. Thompson,
Debtor.

Case No. 13-41352
Chapter 7
Hon. Steven Rhodes

EX-PARTE MOTION TO APPROVE MORTGAGE LOAN MODIFICATION

Debtor, by attorney Robert Keyes, requests the entry of an Order approving the mortgage note modification to be entered into by the Debtor and Wells Fargo, N.A., and in support states as follows:

1. The Debtor filed a chapter 7 bankruptcy on January 28, 2013, which is still pending.
2. Wells Fargo, N.A., has determined the Debtor is eligible for modification of the current mortgage note.
3. Wells Fargo, N.A., is the servicer of the loan and offered Debtor a trial modification which Debtor has successfully completed. Thereafter, Wells Fargo, N.A., approved a permanent modification subject to the approval of the bankruptcy court. (Exhibit 2)
4. Modification of the loan is in the best interests of the Debtor, as it will permanently reduce the interest rate, which will result in the monthly payment as stated in Debtor's Schedule J. (Exhibit 3)
5. Modification of the loan will have no effect on the bankruptcy estate or other creditors.
6. A proposed Order is attached as Exhibit 1.

WHEREFORE, the Debtor requests entry of an Order approving modification.

April 24, 2013

/s/ Robert Keyes
Attorney for Debtor
300 North Huron Street
Ypsilanti, MI 48197
(734) 662-1590

Exhibit 1

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re: Case No. 13-41532
Muhammad D. Thompson, Chapter 7
Debtor. Hon. Steven Rhodes

ORDER APPROVING MORTGAGE LOAN MODIFICATION

Debtor has filed a motion requesting this Court to enter an order approving a loan modification with Wells Fargo, N.A.:

IT IS HEREBY ORDERED that Debtor's loan modification under the terms and conditions as set forth in the motion is approved.

Exhibit 2



Date: 04/01/2013

John Robert Keyes
300 North Huron Street
Ypsilanti, MI 48197

Subject: Loan modification proposal
Borrower(s):
MUHAMMAD D THOMPSON
Bankruptcy No.: 13-41532
Account No.: 9172
Property Address:
351 GREENLAWN ST
YPSILANTI MI 48198

Account Information

Fax:	1-866-359-7234
Telephone:	1-800-416-1472
Correspondence:	PO Box 10335 Des Moines, IA 50306
Hours of operation:	Mon -Thur, 7 a.m. -10 p.m.; Fri, 7 a.m. -8p.m.; Sat, 7 a.m. - 6 p.m.; Sun, 9 a.m. - 8p.m. CT
Loan number:	9172
Property address..	351 GREENLAWN ST YPSILANTI MI 48198

Dear John Robert Keyes :

We have received consent from your office to discuss workout options with your client. We can offer your client a plan that we hope is workable to both parties.

The modification we propose includes the following changes:

Current Terms		Proposed Modified Terms	
Current Unpaid Balance	\$ 124,671.17	Modified Unpaid Balance	\$ 130,090.36
Current Maturity Date	04/01/35	Modified Mortgage Term	360
Current Interest Rate	6.00000 %	Interest Rate	3.250000%
Current Payment Due Date	12/01/12	Post Modification Due Date	06/01/2013
Current Principal & Interest	\$ 844.69	Post Modification Principal & Interest	\$ 566.16
Current Payment Amount	\$ 1,153.43	Estimated Modified Payment amount	\$ 874.90
Amount Capitalizing	\$ 5,419.19	Contribution Required	\$ 467.98

Your important next steps

Please review the proposal with your client. If the terms meet your approval, the next step is to file a petition with the bankruptcy court to gain their consent to modify the first mortgage. Your client will need to continue to make their trial period payments if applicable while we are waiting for consent from the court. When you receive written consent, please forward it to my attention. Once received, we will send the loan documents to you and your attorney for original signatures. We will then withdraw any proof of claim in this case and process the modification as noted.

If the case has already closed, forward to us a copy of the release. If the terms are not satisfactory to you, please contact us and we will close the file with no further actions. **Approval of the loan modification is contingent on court consent or release of the case.**

If your client is seeking a reaffirmation

If your client intends to reaffirm, please provide us with the agreement specific to your district. With regard to a bankruptcy, we do not have a standard reaffirmation agreement to extend because requirements vary from district to district. Once we receive your district-specific agreement, we will complete the required entries and return it to your office for the required undue hardship analysis and filing with the respective court.

Call me today if you have any questions

If you or your client has questions about the information in this letter, please call me at the number below.

Sincerely,

Home Preservation Bankruptcy Specialist

LAURA PALMER

877-397-0087 Ext. 3141

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Exhibit 3

B6J (Official Form 6J) (12/07)

In re Muhammad Devon Thompson

Case No. _____

Debtor(s) _____

SCHEDULE J - CURRENT EXPENDITURES OF INDIVIDUAL DEBTOR(S)

Complete this schedule by estimating the average or projected monthly expenses of the debtor and the debtor's family at time case filed. Prorate any payments made bi-weekly, quarterly, semi-annually, or annually to show monthly rate. The average monthly expenses calculated on this form may differ from the deductions from income allowed on Form 22A or 22C.

Check this box if a joint petition is filed and debtor's spouse maintains a separate household. Complete a separate schedule of expenditures labeled "Spouse."

1. Rent or home mortgage payment (include lot rented for mobile home)	\$ <u>870.00</u>
a. Are real estate taxes included?	Yes <u>X</u> No _____
b. Is property insurance included?	Yes <u>X</u> No _____
2. Utilities:	\$ <u>270.00</u>
a. Electricity and heating fuel	\$ <u>75.00</u>
b. Water and sewer	\$ <u>0.00</u>
c. Telephone	\$ <u>175.00</u>
d. Other <u>See Detailed Expense Attachment</u>	\$ <u>50.00</u>
3. Home maintenance (repairs and upkeep)	\$ <u>600.00</u>
4. Food	\$ <u>100.00</u>
5. Clothing	\$ <u>50.00</u>
6. Laundry and dry cleaning	\$ <u>100.00</u>
7. Medical and dental expenses	\$ <u>250.00</u>
8. Transportation (not including car payments)	\$ <u>50.00</u>
9. Recreation, clubs and entertainment, newspapers, magazines, etc.	\$ <u>20.00</u>
10. Charitable contributions	\$ <u>0.00</u>
11. Insurance (not deducted from wages or included in home mortgage payments)	\$ <u>0.00</u>
a. Homeowner's or renter's	\$ <u>0.00</u>
b. Life	\$ <u>0.00</u>
c. Health	\$ <u>0.00</u>
d. Auto	\$ <u>101.00</u>
e. Other	\$ <u>0.00</u>
12. Taxes (not deducted from wages or included in home mortgage payments) (Specify)	\$ <u>0.00</u>
13. Installment payments: (In chapter 11, 12, and 13 cases, do not list payments to be included in the plan)	\$ <u>298.00</u>
a. Auto	\$ <u>0.00</u>
b. Other	\$ <u>0.00</u>
c. Other	\$ <u>0.00</u>
14. Alimony, maintenance, and support paid to others	\$ <u>0.00</u>
15. Payments for support of additional dependents not living at your home	\$ <u>0.00</u>
16. Regular expenses from operation of business, profession, or farm (attach detailed statement)	\$ <u>0.00</u>
17. Other <u>See Detailed Expense Attachment</u>	\$ <u>85.00</u>
18. AVERAGE MONTHLY EXPENSES (Total lines 1-17. Report also on Summary of Schedules and, if applicable, on the Statistical Summary of Certain Liabilities and Related Data.)	\$ <u>3,094.00</u>
19. Describe any increase or decrease in expenditures reasonably anticipated to occur within the year following the filing of this document:	
Auto payment will stop in three months. Debtor is currently in trial period for loan mod. The \$870 is the payment. If the loan mod does not go through the mortgage payment will revert to \$1,150.	
20. STATEMENT OF MONTHLY NET INCOME	
a. Average monthly income from Line 15 of Schedule I	\$ <u>2,714.80</u>
b. Average monthly expenses from Line 18 above	\$ <u>3,094.00</u>
c. Monthly net income (a. minus b.)	\$ <u>-379.20</u>

SCHEDULE J - CURRENT EXPENDITURES OF INDIVIDUAL DEBTOR(S)
Detailed Expense Attachment

Other Utility Expenditures:

Cable/internet	\$ 125.00
Cell phones	\$ 50.00
Total Other Utility Expenditures	\$ 175.00

Other Expenditures:

Salon	\$ 25.00
Cleaning supplies	\$ 25.00
Tax preparation	\$ 10.00
Personal hygiene	\$ 25.00
Total Other Expenditures	\$ 85.00